

CS-2023-2931
Andrews

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

- | | |
|--|---|
| 1) CONNIE BASCO, in her individual capacity and Personal Representative of the Estate of STAR SHELLS, deceased, | § |
| | § |
| | § |
| | § |
| 2) ELIJAH REEVES, in his individual capacity and Personal Representative of the Estate of ELIJAH REEVES III, deceased, | § |
| | § |
| | § |
| | § |
| Plaintiffs, | § |
| | § |
| v. | § |
| | § |
| 1) THE CITY OF OKLAHOMA CITY, a municipal corporation, | § |
| | § |
| | § |
| Defendant. | § |

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

MAY 24 2023

**RICK WARREN
COURT CLERK**

42 _____

CJ-2023-2931
CASE NO: CJ-2023-

*Jury Trial Demanded
Attorney's Lien Claimed*

PLAINTIFFS' ORIGINAL PETITION

COME NOW the Plaintiffs, Connie Basco, individually and as Personal Representative of the Estate of Star Shells, and Elijah Reeves, individually and as the Personal Representative of the Estate of Elijah Reeves III, and for their causes of action against the Defendant, The City of Oklahoma City, allege and state as follows:

**I.
PARTIES AND VENUE**

1. Plaintiff Connie Basco was the mother of Star Shells, deceased. Plaintiff Connie Basco is now and was, at all relevant times, a resident of Oklahoma City, County of Oklahoma, State of Oklahoma.

2. Plaintiff Elijah Reeves was the father of Elijah Reeves III, deceased. Plaintiff Elijah Reeves is now and was, at all relevant times, a resident of Oklahoma City, County of Oklahoma, State of Oklahoma.

EXHIBIT

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exhibitsticker.com

3. Defendant The City of Oklahoma City (“OKC”) is a municipality and political subdivision located in Oklahoma County, Oklahoma and is responsible for the operations of the Oklahoma City Police Department (“OKCPD”) and its law enforcement officers. As such, Defendant, The City of Oklahoma City may be sued by name and has the authority to employ law enforcement officers, appoint a police chief, and delegate to the police chief final policy and decision-making authority regarding law enforcement matters for OKC.

4. Defendant’s acts and omissions giving rise to the claims herein occurred in Oklahoma County, State of Oklahoma.

5. The District Court of Oklahoma County has subject matter and personal jurisdiction over the Defendant and venue is proper pursuant to 12 O.S. §§ 134 and 143.

6. Prior to bringing this Petition, Plaintiffs complied with the tort claim notice provisions of the Oklahoma Government Tort Claim Act (“GTCA”), 51 O.S. § 151, *et seq.*, by notifying Defendant of their intent to file state law claims in connection with the events and injuries described herein. The GTCA process has been exhausted. This action is timely brought pursuant to 51 O.S. § 157.

II. ALLEGATIONS

Plaintiffs reallege and incorporate by reference the allegations contained in paragraphs 1-6, and further allege as follows:

7. This action arises from a motor vehicle wreck that occurred in Oklahoma County, Oklahoma on May 24, 2021.

8. The motor vehicle wreck was caused by OKCPD officers engaging in a negligent, grossly negligent, reckless, and improper police chase.

9. OKCPD's meaningless and stupid police chase was a violation of Star Shells and Elijah Reeves III's fundamental due process right to life.

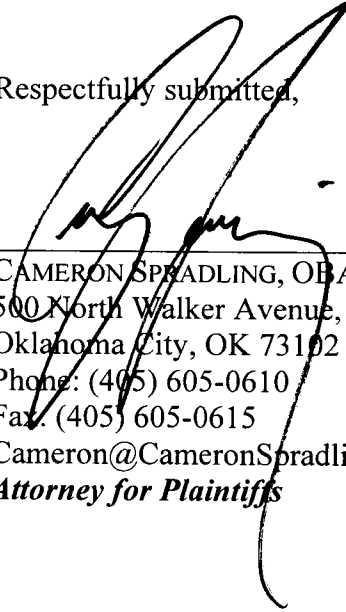
10. The foreseeable result of OKCPD's deliberate conduct was a preventable motor vehicle wreck on the morning of May 24, 2021, at the intersection of NE 16th Street and N. Martin Luther King Avenue in Oklahoma City, Oklahoma.

11. At all times pertinent to, OKC violated the duties owed to Star Shells and Elijah Reeves III. Such negligent acts and/or omissions, taken separately or collectively, constitute a proximate cause of the wrongful deaths of Star Shells and Elijah Reeves III on May 24, 2021.

12. The wrongful deaths of Star Shells and Elijah Reeves III was also the result of violations of their civil rights pursuant to 42 U.S.C. § 1983.

WHEREFORE, Plaintiffs, Connie Basco, individually and as Personal Representative of the Estate of Star Shells, and Elijah Reeves, individually and as the Personal Representative of the Estate of Elijah Reeves III, pray for judgment against Defendant OKC for damages in an amount in excess of the requisite amount for diversity jurisdiction, together with all other appropriate relief.

Respectfully submitted,



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